

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LHB INSURANCE BROKERAGE INC., On
Behalf Of Itself and All Others Similarly
Situating,

Plaintiff,

- against -

CITIGROUP, INC. and CITIGROUP GLOBAL
MARKETS, INC.,

Defendant.

Case No. 08-cv-3095 (LTS)

LISA SWANSON, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

- against -

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS, INC., and CITI SMITH BARNEY,

Defendants.

Case No. 08-cv-3139 (LTS)

SAMUEL A. STOCKHAMER and ALICE L.
STOCKHAMER, On Behalf of Themselves and
All Others Similarly Situated,

Plaintiff,

- against -

CITIGROUP INC. and CITIGROUP GLOBAL
CAPITAL MARKETS, INC.,

Defendants.

Case No. 08-cv-3904 (LTS)

WEDGEWOOD TACOMA LLC, Individually
and On Behalf of All Others Similarly Situated,

Plaintiff,

- against -

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS, INC., and CITI SMITH BARNEY,

Defendants.

Case No. 08-cv-4360 (UA)

**THE DIGNAM GROUP'S STATEMENT OF NON-OPPOSITION TO DR.
MICHAEL A. PASSIDOMO'S MOTION FOR CONSOLIDATION AND
FOR APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL**

On May 27, 2008, class members David Dignam and Ted Link (collectively, the “Dignam Group”) filed a timely motion, pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(3)(B), for their appointment as Lead Plaintiff and approval of their selection of counsel. Lead Plaintiff motions were also filed by (1) Dr. Michael A. Passidomo, (2) Wedgewood Tacoma, LLP and Jemstone, LLC, and (3) LHB Insurance Brokerage, Inc., Ida Gross, Michael Bell, Robin Schultz and Ian Lande.

Having reviewed the competing lead plaintiff motions, the Dignam Group submits this statement of non-opposition to Dr. Michael A. Passidomo’s Motion for Consolidation and for Appointment of Lead Plaintiff and Lead Counsel. Dr. Passidomo appears to have the largest current financial interest in the relief sought by the class and to otherwise satisfy the typicality and adequacy requirements of Rule 23 of the Federal Rules of Civil Procedure. 15 U.S.C. § 78u-4(a)(3)(B)(iii).

DATED: June 16, 2008

Respectfully submitted,

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By: Jonathan K. Levine
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**Counsel for David Dignam and Ted
Link**

CERTIFICATE OF SERVICE

I, Jonathan K. Levine, hereby certify that on June 16, 2008, I caused the following document(s) to be filed electronically with the United States District Court for the Southern District of New York through the Court's mandated ECF service:

- 1. THE DIGNAM GROUP'S STATEMENT OF NON-OPPOSITION TO DR. MICHAEL A. PASSIDOMO'S MOTION FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL**

Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the document(s) upon confirmation of e-filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of June, 2008 at San Francisco, California.

/S/ Jonathan K. Levine